HUSTLER
Turf Equipment

Excel Industries, Inc.
P.O. Box 7000
200 South Ridge Road
Hesston, Kansas
67062-2097
620-327-4911
www.excelhustler.com

March 12, 2004

Steff Fackrell
Kansas Department of Health and Environment
South Central District Office
Waste Management Program
130 S. Market, Suite 6050
Wichita, Kansas 67202-3802

Dear Ms. Fackrell:

This letter is in response to the Hazardous Waste Inspection conducted by Kansas Department of Health and Environment (KDHE) representative Steff Fackrell the week of February 9th, 2004. During this inspection, three hazardous waste violations were identified. This letter addresses each violation and the actions taken to resolve the issue.

1) KAR 28-31-4(g)(1)(A) - Failure to conduct weekly inspections of hazardous waste storage containers during the weeks of 3/24/03, 7/28/03 and 12/29/03.

   Action Taken: Two of the inspections were missed during plant shutdowns. A weekly inspection schedule, enclosed, was created identifying the primary, secondary, and third person responsible for ensuring that the weekly hazardous waste inspections are completed regardless of plant shutdowns.

2) KSA 65-3441(a)(2) – Storage of hazardous waste longer than 90 days without a permit or other written approval – two 55-gallon drums (waste acetone) with accumulation start dates of 10/25/03 and 11/06/03.

   Action Taken: A waste shipment was made on 02/17/2004 to remove the drums from the facility. A copy of the manifest is enclosed. Additional training was conducted with facility personnel to ensure that appropriate labeling and notification was made regarding hazardous waste. Labels were added to drums to clarify for personnel the satellite drums and the drums ready for shipment.

3) KAR 28-31-4(g)(4) and 40 CFR 265.52(f) – Contingency plan does not describe evacuation signals and routes.

   Action Taken: This violation was cited in the hazardous waste inspection conducted on September 30, 1998. In response, Excel Industries submitted the evacuation routes for each facility in a letter dated March 2, 1999. It appears that while the update was made and submitted, Excel neglected to include the copies of the maps in the actual Contingency Plan. This has been completed and an updated map of Plant 4, the new facility, has also been added. A copy of the updated contingency plan is enclosed. All Contingency Plan Holders identified in Section 9.0 have been given an updated copy of the plan.

RCRA

551341

Excel Industries, Inc. wants to emphasize that the company is committed to properly managing and reducing quantities of hazardous waste. For example, we have recently completed the installation of a powder-paint coating facility that will significantly reduce the amount hazardous waste generated. If you have any questions or need any additional information, please do not hesitate to contact me at (620) 327-1211.

Sincerely,

Lelyn Peters
Facilities Manager

enclosures

Schedule for Hazardous Waste Weekly Inspections for 2004

Week of:	Primary Person	Secondary Person	Tertiary Person
3/1/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
3/8/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
3/15/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
3/22/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
3/29/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
4/5/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
4/12/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
4/19/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
4/26/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
5/3/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
5/10/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
5/17/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
5/24/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
5/31/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
6/7/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
6/14/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
6/21/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
6/28/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
7/5/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
7/12/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
7/19/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
7/26/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
8/2/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
8/9/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
8/16/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
8/23/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
8/30/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
9/6/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
9/13/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
9/20/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
9/27/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
10/4/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
10/11/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
10/18/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
10/25/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
11/1/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
11/8/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
11/15/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
11/22/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
11/29/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
12/6/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
12/13/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
12/20/2004	Richard Blouin	Lelyn Peters	Integrated Solutions, Inc.
12/27/2004	Integrated Solutions, Inc.	Richard Blouin	Lelyn Peters

DLB911
3 04

ORDER # 277875 RR

Please print or type. (Form designed for use on elit pitch) typewriter.) Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. K S D 0 0 7 2 3 7 2 8 0 — Manifest Document No. 02174

2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

GENERATOR

3. Generator's Name and Mailing Address
EXCEL INDUSTRIES
ATTN: LELYN PETERS
200 S. RIDGE ROAD; HESSTON, KS 67062

4. Generator's Phone (620) 327-1211 **EMERGENCY CONTACT: BOX 15**

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name: UNIVAR USA INC.

6. US EPA ID Number: K S D 0 0 0 8 0 9 7 1 5

C. State Transporter's ID KSD000809715

D. Transporter's Phone 316-267-6292

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
SYSTECH ENVIRONMENTAL CORPORATION
1420 S. CEMENT ROAD
FREDONIA, KS 66736

10. US EPA ID Number: K S D 9 8 0 6 3 3 2 5 9

G. State Facility's ID

H. Facility's Phone 620-378-4451

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	RQ, WASTE FLAMMABLE LIQUIDS, N.O.S. (ACETONE, BUTYL ACETATE) 3, UN1993, PG II, (RQ=100), (EPA D001 F003), (ERG 128)	X	007	D M	02400	P	D001 F003
b.	RQ, WASTE GASOLINE 3, UN1203, PG II, (RQ=100), (EPA D001 D018), (ERG 128)	X	001	D M	00200	P	D001 D018
c.	RQ, WASTE PAINT 3, UN1263, PG II, (RQ=100), (EPA D001 D035 F003 F005), (ERG 128)	X	002	D M	00800	P	D001 D035 F003 F005
d.							

J. Additional Descriptions for Materials Listed Above
11a. VAM8H1119 WASTE ACETONE
11b. VAM8H1120 WASTE GASOLINE
11c. VAS3A1695 PAINT WASTE

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information WEAR APPROPRIATE PROTECTIVE GEAR WHEN HANDLING. EMERGENCY CONTACT: CHEMTREC: 1-800-424-9300. CALLER MUST IDENTIFY UNIVAR USA AS SHIPPER.
PLACARDS PROVIDED BY CARRIER/SHIPPER YES/NO DRIVER SIGNATURE _____

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
RICHARD W. BLOUIN	Richard W. Blouin	02	26	04

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
FRANK BARRETT	Frank Barrett	02	26	04

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
John Mizuna		02	27	04

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EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

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ORIGINAL-RETURN TO GENERATOR

Hazardous Waste Generator Contingency Plan

for

Excel Industries, Inc.

Located at

200 South Ridge Road
Hesston, Kansas

March 11, 2004

Hazardous Waste Generator Contingency Plan

for

Excel Industries, Inc.

Located at

200 South Ridge Road
Hesston, Kansas

March 11, 2004

Table of Contents

1.0 GENERAL INFORMATION

- This contingency plan is written in compliance with 40 CFR 265.52-56

- Excel Industries
  200 South Ridge Road
  Hesston, Kansas 67062
  (620) 327-4911

- EPA I.D. No.: KSD007237920

- Operator: Paul Mullet, President
  [redacted] Ex. 6 PII
  Office Phone: (620) 627-1115
  Home Phone: [redacted]

- Type of Facility: Manufacturer of Industrial and Commercial Turf and Grounds Maintenance Equipment.

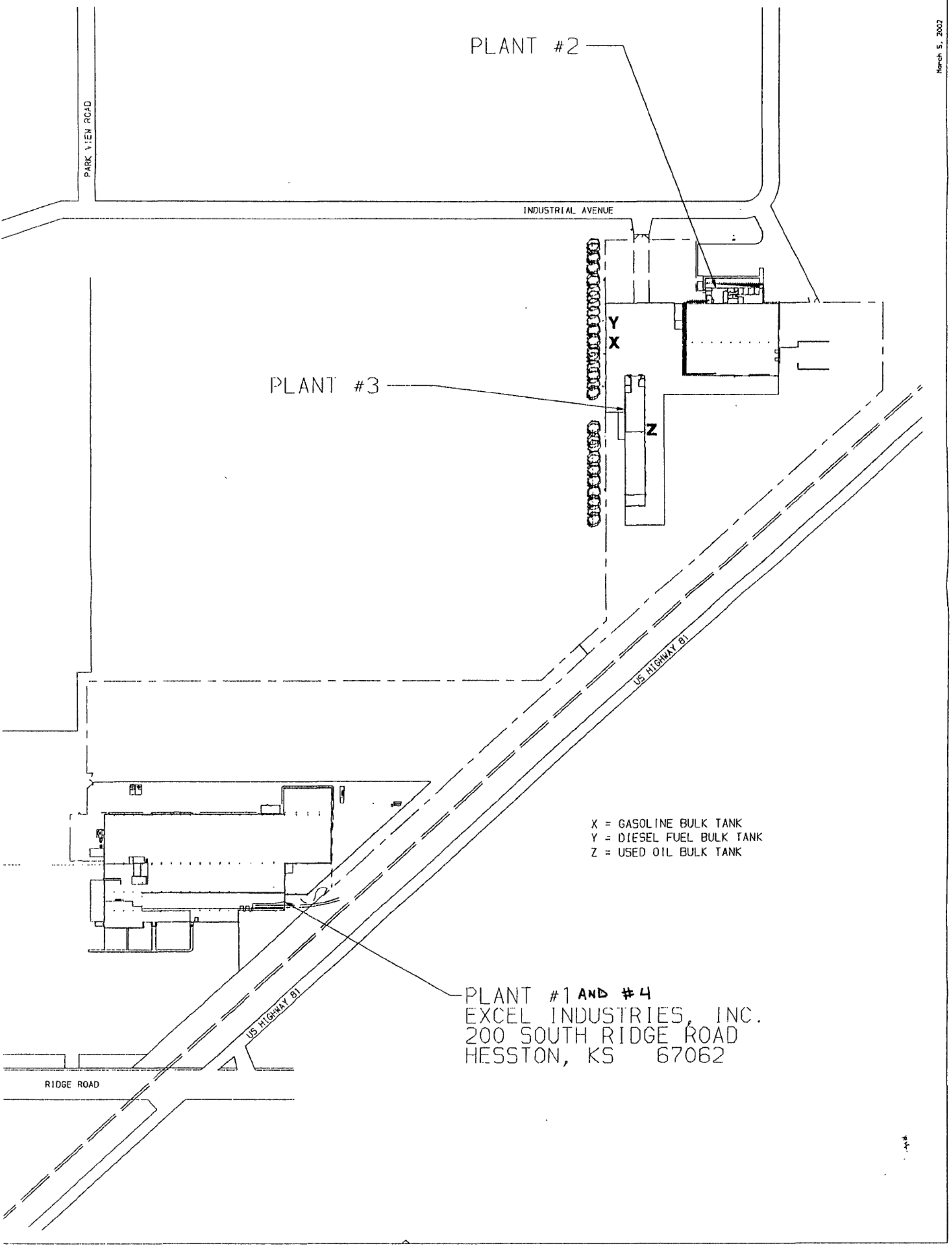
1.1 Description of Treatment, Storage, and/or Disposal Activities

Either Safety-Kleen or Univar transports hazardous waste generated by Excel Industries, Inc. to a hazardous waste treatment facility.

- Waste Urethane Paint is collected in 55-gallon drums. This is a characteristic hazardous waste due to the flash point. This waste is collected from the cleaning operations of the two-part paint mixing equipment.
- Waste Urethane Paint Filter Media may be collected in 55-gallon drums. This is not a hazardous waste. This waste is collected from the paint booth during filter changes. This material or its ashes can be taken to an appropriate landfill facility when they are generated.
- Waste Powder Paint Filter Media may be collected in 55-gallon drums. This waste stream is anticipated, but not generated to-date. It is assumed that this waste stream will be non-hazardous through process knowledge.
- Waste Naphtha (Mineral Spirits) is collected in 5-gallon pails. This is a characteristic hazardous waste due to combustibility. This waste is located in parts washing vats provided by Safety-Kleen. The vats have circulating pumps on them, recycling the liquid and filtering the contaminants. This material is removed and replenished by Safety-Kleen approximately every 12 weeks.
- Waste Combustible Liquid is collected in a 5-gallon container. This is a characteristic hazardous waste due to flash point. The waste is collected from a self-contained washstand furnished by Safety-Kleen that is used to clean paint guns and related equipment. This material is removed and replenished by Safety-Kleen approximately every 8 weeks.

- Waste Liquid Paint (from air dry or baked enamel paint) is collected in 55-gallon drums. This is a characteristic hazardous waste due to flash point. This waste is collected from the residue remaining during a color or drum change.
- Waste Thinner (D100, D150 or Mineral Spirits) is collected in 55-gallon drums. This is a characteristic hazardous waste due to flash point. This waste is collected from cleaning operations, such as paint guns, paint pots and related equipment.
- Waste Gasoline and Water is collected in 55-gallon drums. This is a characteristic hazardous waste due to flash point. This waste is collected when gasoline tanks on the products become contaminated with rust and water.
- Waste Antifreeze and Oil is collected in 55-gallon drums. This waste is controlled due to the ethylene glycol. The waste is collected when antifreeze and oil are drained from turf equipment due to production reasons.
- Waste Ashes are collected in 55-gallon drums. This is a non-hazardous waste. This waste is collected from a process that burns paint off of hooks so the hooks may be reused. Paint filter media is also burned, generating ashes. These ashes are taken an appropriate landfill facility when they are generated.
- Waste sludge is collected in 55-gallon drums. This waste is non-hazardous. A filter press is used in the wastewater treatment system to remove solids from the treatment system.
- Waste Filters from Stage 1 are collected in 55-gallon drums. This waste is non-hazardous. The filters are used to collect suspended particles in the pre-filter for the first stage of the metal pre-treatment system.
- Used Pleated Paper Filters are collected when monitoring equipment indicates a change is necessary. These filters are located in the vestibule at each end of the environmental room. This waste is non-hazardous.
- Used Bag Filters are collected when monitoring equipment indicates a change is necessary. These filters are located in the vestibule at each end of the environmental room. This waste is non-hazardous.
- Used Pleated Paper Filters are collected when necessary in the 10^{th} stage blower of the metal pre-treatment system. This waste is non-hazardous.
- Used Batteries are collected on pallets. These are a universal waste. They are generated from material handling equipment. Various recyclers are used to take this waste.
- Used Oil is collected in a tank. This waste is non-hazardous. It is generated from vehicle and equipment maintenance.
- Used Coolant is collected in a tank. This waste is non-hazardous. This waste is generated from the sumps of production machines, such as drill presses, surface grinders, and metal cutting saws.
- Used Tires are collected on pallets. This waste is non-hazardous. This waste is generated by used equipment and is taken to the Harvey County Transfer Station for recycling.
- Used Fluorescent Lamps are collected in boxes. This is a universal waste generated when light fixtures are changed.

March 5, 2002 FACILITY-13



2.0 EMERGENCY COORDINATORS

2.1 Primary Coordinator

Lelyn Peters, Facilities Manger
[redacted]
Office Phone: (620) 327-1211; Pager: [redacted]
Home Phone: [redacted]

2.2 Secondary Coordinator

Ex. 6 PII

Richard Blouin, Maintenance Supervisor
[redacted]
Office Phone: (620) 327-1181; Pager: [redacted]
Home Phone: [redacted]

2.3 Role of the Emergency Coordinator

- The emergency coordinator serves as chief of the emergency crew.
- The emergency coordinator can appoint fellow employees to assist them in the event of an emergency.
- The above named coordinators have received vital emergency response training, are familiar with the waste generation process, and have had additional fire or first aid training.
- The above named coordinators are always "on-call" and may be contacted by either telephone or pager.

3.0 IMPLEMENTATION OF THE CONTINGENCY PLAN

It will be the duty of the emergency coordinator to implement this Contingency Plan should an accident threaten human health or the environment.

Depending on the degree of seriousness, the following potential emergencies may call for the implementation of this Plan:

- A spilled, punctured, or ruptured drum containing hazardous waste
- A spilled, punctured, or ruptured drum containing non-hazardous waste
- Spilled or ruptured batteries
- Spilled or ruptured bulk Used Oil tank
- Punctured or ruptured tank in the metal pre-treatment or wastewater treatment facility
- Fire in the area of the former paint pump house where wastes are gathered during drum filling operations or in the satellite accumulation area

4.0 EMERGENCY RESPONSE PROCEDURES

4.1 Notification

Any employee discovering a fire or hazardous materials release must immediately notify his/her supervisor and the emergency coordinator.

In the event of a fire in the pump house or the immediate area, the supervisor is to activate the fire alarm. The fire alarm, when sounded, consists of sirens with up and down pitches. All employees are to evacuate the building following the evacuation routes provided in Appendix A. The supervisor or emergency coordinator will contact the Hesston Fire Department by dialing 9-1-1 with the vital information and have them respond. He/she will then proceed to the hazard area and contain the fire with fire extinguishers if it is safe to do so.

In the event of a fire in the satellite area, the supervisor or emergency coordinator will contact the Hesston Fire Department by dialing 9-1-1 with the vital information and have them respond. At this point it has been determined that the plant wide evacuation is not necessary. He/she will then proceed to the hazard area and contain the fire with fire extinguishers if it is safe to do so.

In the event of a hazardous materials release, the supervisor will inform that emergency coordinator of the situation. A response team consisting of trained personnel from the Maintenance Department will respond and clean up the affected area.

Any employee upon hearing the fire alarm must immediately evacuate the building from the nearest means of egress other than the affected area. No employee will be allowed to re-enter the building until the emergency coordinator gives the "all clear".

The emergency coordinator will evaluate each situation and notify the appropriate parties identified in Section 6.0. A head count of all persons in the affected area will be taken to determine if the location of all employees is known.

If necessary, the emergency coordinator will call the National Response Center at 1-800-424-8802 and report the incident. The report will include the following:

- Name and telephone number of the reporter
- Name and address of the facility
- Time and type of incident (i.e. spill occurred at 10:00 A.M.)
- Identification and quantity of materials involved (i.e. 60 gallons of "Waste Flammable Liquid")
- Extent of injuries (i.e. one victim with multiple traumas and skin rash)
- Possible hazards to the environment and human health outside the facility (i.e. possible contamination of ground water)

4.2 Containment and Control

The emergency coordinator will take all necessary measures to contain all hazardous conditions and to prevent it's spread to surrounding property areas.

In case of a spill, sorbent material will be placed on the spill. All affected material (i.e. contaminated soil and sorbent material) will be classified appropriately depending on the material.

While handling material from a hazardous waste spill, protective clothing must be worn. Those personal protective equipment (PPE) include: rubber boots, rubber apron, rubber sleeved gloves, and a face shield.

4.3 Follow-Up Actions

Following the containment and control of the emergency, the emergency coordinator will provide for the collection of the hazardous waste and contaminated soil, water or other materials.

The emergency coordinator will ensure that all emergency apparel is cleaned and placed back in service. This equipment must be checked and replaced if necessary.

The emergency coordinator will remove from service and replace any fire extinguishers that have been discharged. The fire extinguishers will be replaced into positions from which they were originally removed.

The emergency coordinator will investigate the cause of the spill, rupture, or fire and will take steps to prevent a reoccurrence of such or similar incidents.

The emergency coordinator will ensue that the cause of the emergency has been eliminated and the clean up and restoration has progressed to the point of no longer jeopardizing the health and safety of the employees. Additionally, the emergency coordinator will ensure that the appropriate authorities (i.e. KDHE, Environmental Protection Agency (EPA), etc.) have been notified before permitting the resumption of operations affected by the emergency.

5.0 EMERGENCY EQUIPMENT

All areas of the plant have access to 20A10BC rated dry chemical fire extinguishers.

All areas of the plant have access to sorbent material for spill clean up.

Shovels and squeegees are available for clean up from the Maintenance Department.

The Hesston Fire Department is available for response 24 hours/day. It is a well-trained and organized group of firefighters dedicated to the purpose of fighting and preventing fires. They have also been trained to the operations level in hazardous materials. Mutual aid agreements

have been made with surrounding Fire Departments should additional help be needed. Response time is minimal.

The Hesston Ambulance Department is available for response 24 hours/day. This organization is equipped and well trained to respond to medical emergencies of any sort. Response time is minimal.

There is a "Y" connection on the north side of the Plant #1 building connected to the automatic sprinkler system which can be used by the Hesston Fire Department to boost the line pressure in the sprinkler system from 45 psi to 200 psi.

Plant #4 is covered by an automatic sprinkler system that sends an alarm to the Harvey County Communications Center in Newton, Kansas when activated. The Hesston Fire and Ambulance Departments are dispatched from there.

There is a "Y" connection on the east side of the Plant #4 building connected to the automatic sprinkler system which can be used by the Hesston Fire Department to boost the line pressure in the sprinkler system from 45 psi to 200 psi.

Plant #1 is equipped with two fire hydrants that can be used by the Hesston Fire Department for additional water as needed during a fire.

Plant #4 is equipped with one fire hydrant that can be used by the Hesston Fire Department for additional water as needed during a fire.

The Hesston Fire Department is equipped with foam agents and equipment to apply foam to liquid fires.

The plants are equipped with First Aid Stations and trained First Aid Personnel. These personnel are located in all departments throughout the facility.

Eye wash stations and showers are throughout the facilities.

The Safety Committee meets monthly to discuss safety conditions throughout all departments.

A First Aid vehicle is available to transport individuals to and from a doctor's office.

6.0 COORDINATION AGREEMENTS

6.1 Hesston Fire Department

The Hesston Fire Department can be reached by telephone at 9-1-1.

The Hesston Fire Department has received a copy of this contingency plan.

The Hesston Fire Department has received special training on the handling of hazardous materials and fighting liquid fires.

The Hesston Fire Department has direct communication capabilities, via two-way radio, with the Hesston Police Department, the Hesston Ambulance Department, Harvey County Dispatch, and the Harvey County Emergency Management Coordinator.

The Hesston Fire Department has conducted several pre-planning sessions throughout their facility.

6.2 Hesston Police Department

The Hesston Police Department can be reached by telephone at 9-1-1.

The Hesston Police Department has received a copy of this contingency plan.

The Hesston Police Department has direct communication capabilities, via two-way radio, with the Hesston Fire Department, the Hesston Ambulance Department, Harvey County Dispatch, and the Harvey County Emergency Management Coordinator.

6.3 Hesston Ambulance Department

The Hesston Ambulance Department can be reached by telephone at 9-1-1.

The Hesston Ambulance Department has received a copy of this contingency plan.

The Hesston Ambulance Department has received special training on the handling of hazardous materials and the treatment of exposures to hazardous materials as well as burns from fires.

The Hesston Ambulance Department has direct communication capabilities, via two-way radio, with the Hesston Police Department, the Hesston Fire Department, Harvey County Dispatch, and the Harvey County Emergency Management Coordinator.

6.4 Harvey County Emergency Management Coordinator

The Harvey County Emergency Management Coordinator (HCEMC) can be reached by telephone at 9-1-1.

The HCEMC has received a copy of this contingency plan.

The HCEMC has received special training on the handling of hazardous materials and the treatment of exposures to hazardous materials as well as burns from fires.

The HCEMC has direct communication capabilities, via two-way radio, with the Hesston Police Department, the Hesston Fire Department, Hesston Ambulance Department and the Harvey County Dispatch.

6.5 Newton Medical Center

Newton Medical Center can be reached at (316) 283-2700.

The Newton Medical Center personnel have received a special briefing on the health hazards of site-specific hazardous materials and the appropriate treatment thereof.

6.6 Dr. Mark Hall

Dr. Mark Hall can be reached at (620) 327-2440.

Dr. Mark Hall's office has received a special briefing on the health hazards of site-specific hazardous materials and the appropriate treatment thereof

6.7 National Response Center

The National Response Center can be reached at 1-800-424-8802.

The National Response Center in Washington has been contacted to obtain guidance on notification procedures should a reportable spill or rupture occur. Information needed includes the following:

- Name of person making the report
- Company name
- Telephone number
- Specific location of discharge
- Body of water (if appropriate)
- Source of discharge
- Cause of discharge
- Operation of process during discharge
- Vehicle identification (if appropriate)
- Number of dead
- Number of injured
- Status of injured
- Property damage
- Quantity of discharge
- Quantity of discharge material reaching body of water
- Weather conditions
- Actions taken at scene to secure, contain, and recover the discharge

- What other agencies have been notified
- Chemical name and characteristics of discharged material

7.0 EVACUATION PLAN

The Hesston Police, Fire, and Ambulance Departments will serve as an evacuation tool to remove all personnel from the building if the emergency coordinator determines that it is necessary.

The fire alarm will be used if there is a fire.

All personnel are to exit to the nearest door not affected by the emergency.
All personnel should congregate in the meeting site after evacuation as described on the drawings in Appendix A. This is necessary for headcount purposes.

All personnel are to remain outside the building until the emergency coordinator gives the "all clear."

All personnel should stay clear of the affected area so that emergency vehicles have access to the emergency situation.

8.0 REQUIRED REPORTS

The emergency coordinator will notify EPA Regional Administration and the KDHE that the follow-up actions have been implemented.

The emergency coordinator will note in the operating records the time, date, and details of any incident that required implementation of this Contingency Plan. A report will be submitted on the incident to the EPA Regional Administrator in accordance with 40 CFR 265.56(j).

The emergency coordinator will revise this contingency plan in accordance with the experience required during each emergency situation and will submit copies of the revisions to all persons specified in Section 9.0.

9.0 CONTINGENCY PLAN HOLDERS

- Paul Mullet, President
  Excel Industries, Inc.
  200 South Ridge Road
  Hesston, Kansas 67062
  Phone: (620) 327-1115

- Bob Mullet, director of Finance and Human Resources
  Excel Industries, Inc.
  200 South Ridge Road
  Hesston, Kansas 67062
  Phone: (620) 327-1148

- Lelyn Peters, Facilities Manager
  Excel Industries, Inc.
  200 South Ridge Road
  Hesston, Kansas 67062
  Phone: (620) 327-1211

- Richard Blouin, Maintenance Supervisor
  Excel Industries, Inc.
  200 South Ridge Road
  Hesston, Kansas 67062
  Phone: (620) 327-1181

- Hesston Fire Department, Chief
  115 East Smith
  Hesston, Kansas 67062
  Phone: (620) 327-2221

- Hesston Police Department, Chief
  115 East Smith
  Hesston, Kansas 67062
  Phone: (620) 327-2020

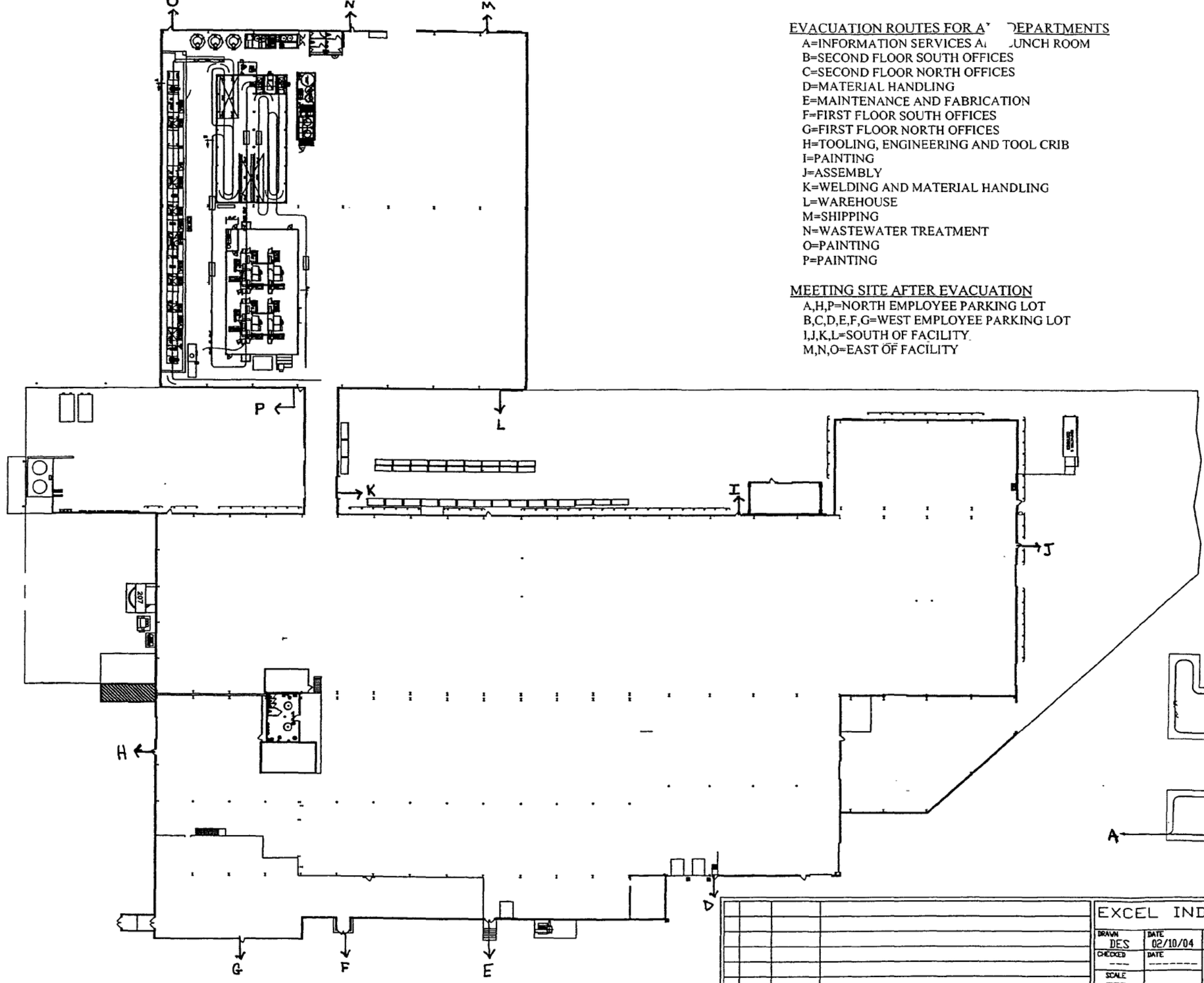
- Hesston Ambulance Department, Chief
  115 East Smith
  Hesston, Kansas 67062
  Phone: (620) 327-2221

- Newton Medical Center
  600 Medical Center Drive
  Newton, Kansas 67114
  Phone: (316) 283-2700

- Dr. Mark Hall, Physician
  705 R. Randall
  Hesston, Kansas 67062
  Phone: (620) 327-2440

- Harvey County Emergency Management Coordinator
  Harvey County Courthouse
  Newton, Kansas 67114
  Phone: (316) 283-6010

APPENDIX A: Evacuation Route for Each Plant



EVACUATION ROUTES FOR A[illegible]EPARTMENTS

A=INFORMATION SERVICES A[illegible]UNCH ROOM
B=SECOND FLOOR SOUTH OFFICES
C=SECOND FLOOR NORTH OFFICES
D=MATERIAL HANDLING
E=MAINTENANCE AND FABRICATION
F=FIRST FLOOR SOUTH OFFICES
G=FIRST FLOOR NORTH OFFICES
H=TOOLING, ENGINEERING AND TOOL CRIB
I=PAINTING
J=ASSEMBLY
K=WELDING AND MATERIAL HANDLING
L=WAREHOUSE
M=SHIPPING
N=WASTEWATER TREATMENT
O=PAINTING
P=PAINTING

MEETING SITE AFTER EVACUATION

A,H,P=NORTH EMPLOYEE PARKING LOT
B,C,D,E,F,G=WEST EMPLOYEE PARKING LOT
I,J,K,L=SOUTH OF FACILITY
M,N,O=EAST OF FACILITY

LET.	BY	DATE	DESCRIPTION

CHG. LET. —
MATERIAL ------- -------
B

EXCEL INDUSTRIES INC., HESSTON,KS

DRAWN DES
DATE 02/10/04
CHECKED ---
DATE ---
SCALE ---
LAYOUT ------

TITLE
EXCEL INDUSTRIES

NUMBER
PLANT LAYOUT

PG 1 OF 1

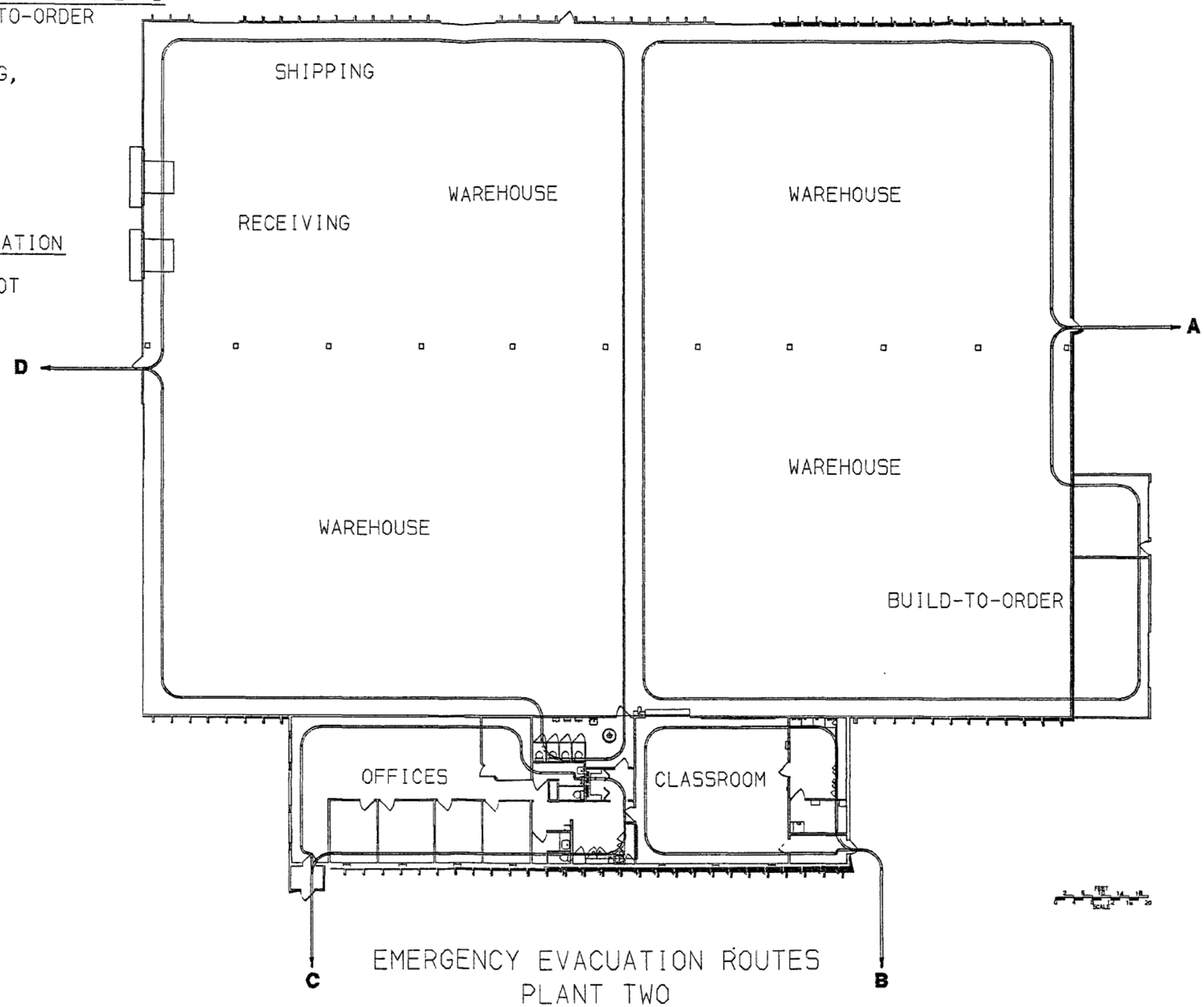
NORTH

EVACUATION ROUTES FOR ALL DEPARTMENTS

A = WAREHOUSE & BUILD-TO-ORDER
B = CLASSROOM
C = OFFICES
D = SHIPPING, RECEIVING, & WAREHOUSE

MEETING SITE AFTER EVACUATION

A = NORTH OPEN LOT
B & **C** = EAST PARKING LOT
D = SOUTH OPEN LOT



EMERGENCY EVACUATION ROUTES
PLANT TWO

EXCEL INDUSTRIES INC., HESSTON, KS

PLANT TWO
PLANT LAYOUT

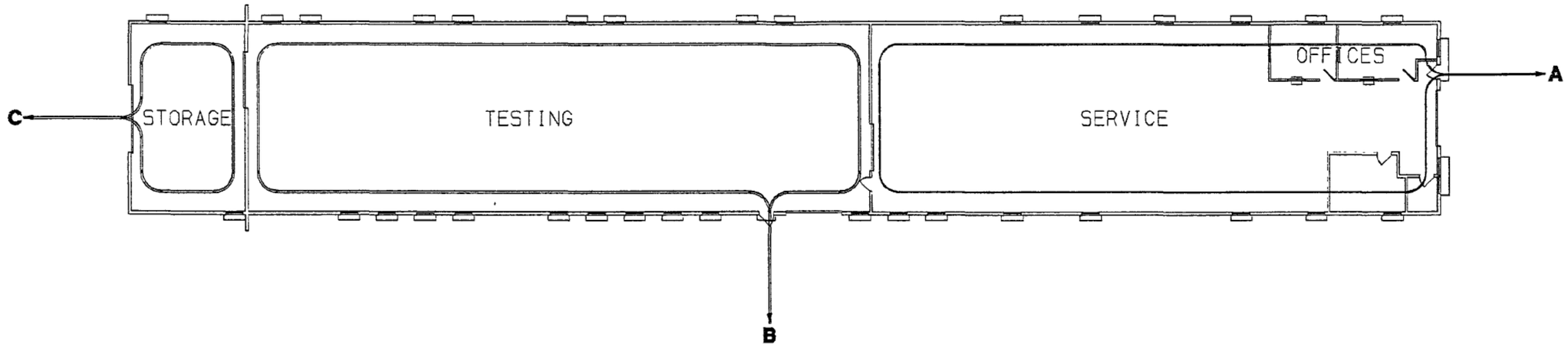
EVACPLT2

EVACUATION ROUTES FOR ALL DEPARTMENTS

A = OFFICE & SERVICE
B = TESTING
C = STORAGE

MEETING SITE AFTER EVACUATION

A = EAST OPEN LOT
B = SOUTH STORAGE YARD
C = WEST STORAGE AREA



EMERGENCY EVACUATION ROUTES
PLANT THREE

FEET
SCALE

EXCEL INDUSTRIES INC., HESSTON, KS
PLANT THREE
PLANT LAYOUT
EVACPLT3